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January 11, 2022

FILED VIA ECF

The Honorable Loretta A. Preska
United States District Judge
Southern District of New York
United States Courthouse
Courtroom 12A 500 Pearl St.
New York, NY 10007-1312

Re: *Verathon, Inc. v. Baxley*, Nos. 21-mc-794 (LAP)

Dear Judge Preska:

We represent Charles Baxley in the above-referenced matter. Pursuant to Your Honor's Individual Practices, Plaintiff seeks an order permitting to file under seal the following documents:

- Unredacted copies of Exhibit 6 to Mr. Baxley's Response to Verathon's Letter Regarding Enforcement

Exhibit 6 listed above contains Mr. Baxley's and Dr. Berall's "HIGHLY CONFIDENTIAL – ATTORNEYS' EYES ONLY" information as designed by Baxley pursuant to the Stipulated Protective Order entered on February 5, 2021 (Dkt. 252), including because it reveals business strategy related to their efforts to monetize the asserted '178 patent through licensing discussions and assertions. Accordingly, Defendant respectfully requests that this Court enter an order that an unredacted version of Exhibit 6 to Mr. Baxley's response letter may be filed under seal.

SO ORDERED.

Dated: January 12, 2022
New York, New York



LORETTA A. PRESKA
Senior United States District Judge

KIRKLAND & ELLIS LLP

Honorable Loretta Preska
January 11, 2022
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Sincerely,

/s/ Christopher DeCoro

Christopher DeCoro

cc: Counsel of Record (via CM/ECF)